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October 2, 2020

By Email/ECFThe Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007Re: *United States v. Anilesh Ahuja, et al.*, 18 Cr. 328 (KPF)

Dear Judge Failla:

We write on behalf of defendants Anilesh Ahuja and Jeremy Shor to inform the Court of the status of our review of the government's recent production and to propose a schedule for next steps.

We have received and reviewed the government's September 24 production and—by letter dated October 1—have asked the government to clarify and confirm certain points and produce certain additional documents. A copy of that letter is attached.

The defense proposes that the Court order the government to respond to our letter by October 12, 2020. In addition, the defense proposes that the Court schedule a hearing in this matter for a date convenient to the Court and the parties in November. The

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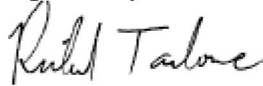
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Honorable Katherine Polk Failla

defense expects that it will thereafter make appropriate motions based on the existing record, the documents produced by the government, and testimony received at the hearing.

We proposed to the government that it respond to our October 1 letter on or before October 12, 2020, at which point the parties could present outstanding issues to the Court. The government did not agree to (or oppose) our proposed schedule for a response to our letter, instead stating it will “consider any response to the defendants’ October 1 letter addressed to the Government and the defendants’ additional letter to the Court containing a request for a hearing.”

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Richard Tarlowe". The signature is fluid and cursive, with the first name "Richard" and last name "Tarlowe" clearly distinguishable.

Richard C. Tarlowe
Roberto Finzi

cc: Counsel of Record